

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

Pauline Bryant,)	Civil Action No.: 4:20-cv-
)	
)	
Plaintiff,)	
)	HEALTHCARE REVENUE RECOVERY
v.)	GROUP, LLC'S ANSWERS TO LOCAL
)	RULE 26.01 INTERROGATORIES
ACS Primary Care Physicians-Southeast, P.C.,)	
TeamHealth d/b/a ALCOA Billing Center and)	
Healthcare Revenue Recovery Group, LLC,)	
)	
Defendants.)	
)	

Defendant Healthcare Revenue Recovery Group, LLC makes these responses to Court-designated interrogatories pursuant to Local Rule 26.01, DSC:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: Defendant is not aware of any subrogation interests at this time.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: Plaintiff has requested a trial by jury.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: Defendant is not publicly owned. Defendant is not the parent, subsidiary, partner, or affiliate of any publicly owned company, no publicly owned company

owns 10% or more of Defendant's indicia of ownership, and Defendant does not own 10% or more of the outstanding shares of any publicly owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: This case was removed to this division because it was pending in the Horry County Court of Common Pleas.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: At this time, Defendant is not aware of any such relation.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: N/A

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: At this time, Defendant is not aware that any other un-named person or legal entity is liable to it or Plaintiff.

Dated: November 18, 2020

GORDON & REES LLP

By s/Josh Dixon

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